



LAZARE POTTER GIACOVAS & MOYLE LLP


747 THIRD AVE, FLOOR 16  
NEW YORK, NEW YORK 10017  
T: 212.758.9300  
F: 212.888.0919  
LPGMLAW.COM

Direct: (212) 784-3291  
yglazer@lpgmlaw.com

May 31, 2022

(via ECF)

Judge Vernon S. Broderick  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 415  
New York, New York 10007

APPLICATION GRANTED  
SO ORDERED   
VERNON S. BRODERICK  
U.S.D.J. 06/01/22

Re:

*Greater New York Mutual Insurance Company v. The Burlington Insurance Company, et al.*  
22 CV 2052 (VSB)

Dear Judge Broderick:

This firm represents defendant The Burlington Insurance Company in this matter. Please accept this letter as the parties' joint request to adjourn the time to file the Joint Letter and Proposed Case Management Plan and Scheduling Order from June 9, 2022 until July 7, 2022.

This declaratory judgment action concerns an underlying personal injury action now pending in New York Supreme Court, Kings County (the "Underlying Action"). There is a mediation scheduled on June 14, 2022 in the Underlying Action which, if successful, would likely resolve both that suit and the instant matter. Thus, the parties respectfully request this adjournment to allow that mediation to proceed, providing two additional weeks in the event further post-mediation discussions are necessary, to save the time and expense in connection with moving forward in this matter. No prior requests for an adjournment have been made, and no other dates will be impacted.

Thank you for your consideration of this joint request.

Very truly yours,

s/Erica R. Sanders

s/Jason Pozner

s/Yale Glazer